



June 18, 2012

Jeffrey Rodin, Federal On-Scene Coordinator
U.S. EPA Region 10, Emergency Response Unit
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

RE: COMMENTS ON GORST CREEK BREMERTON AUTO WRECKING LANDFILL
ENGINEERING EVALUATION AND COST ASSESSMENT (EE/CA)

Dear Mr. Rodin:

The Kitsap Public Health District (Health District) is writing to provide comments on the Gorst Creek/Bremerton Auto Wrecking Landfill Engineering Evaluation/Cost Analysis (EE/CA) and to offer its support for selection and implementation of a corrective action at this site. The Health District would like to thank you for the opportunity to comment on this document.

The Health District would first like to express our appreciation of the work done by your office in evaluating the environmental and public health threats associated with the Gorst Creek Landfill. The EE/CA clearly lays out the alternatives for reducing the threat from the landfill to human health and the environment.

The Health District supports and agrees to implementation of Alternative # 4 - Micro tunneling/pipe jacking - Installation of a conveyance pipe. This alternative is the best compromise between cost and alleviation of the health and environmental concerns. Specific comments prepared by staff on the EE/CA are attached.

Also, in support of this proposal, the Health District agrees to conduct regular inspections at the landfill as part of its long term oversight. The Health District anticipates quarterly inspections for the first year and semi-annual inspections after the first year.

If you have any questions or concerns please feel free to contact Jan Brower (360- 337-5672) or Grant Holdcroft (360-337-5605).

Sincerely,

Scott Lindquist, MD, MPH
Health Officer
Kitsap Public Health District

General Comments:

The Health District would like to request that 4 monitoring wells be installed at the site in conformance with Chapter 173-304 Washington Administrative Code (WAC). Other closure requirements under 173-304, including impermeable cover, should also be addressed.

Specific Comments:

- 1-1 The Health District's official name is the "Kitsap Public Health District" not the "Kitsap County Health Department."
- 1-1 Paragraph 3 – The Health District recommends that "industrial wastes" be added to the description of the wastes disposed of at this landfill. A disposal contract in Health District files indicates that the US Navy directly disposed of wastes at BAWL for two years. "Industrial Wastes" were specifically itemized under that contract for disposal at Ames Landfill. In addition, Brem-Air Inc. contracted to dispose of waste from the City of Bremerton and PSNS for disposal at BAWL after the two year US Navy contract.
- E-5 WAC 173-304, Minimum Standards for Solid Wastes. This landfill was supposed to be closed pursuant to that requirement, however, the owner declared bankruptcy and closed before complying with 173-304 closure requirements.

ARAR Table, last entry KCBH Ordinance 2010-1, adopts WAC 173-350 (not 250), and 173-304, and 173-351, all by reference.